

Camp Navajo
Stakeholder Advisory Group

Thursday, February 8, 2007
Camp Navajo
Bellemont, AZ

Minutes

Members in attendance:

Lee Luedeker, AGFD
Randy Wilkinson, NGB
Tom Britt, community member
Shannon Clark, Coconino National Forest
Nicole Coronado, ADEQ
Shaula Hedwall, USFWS
Kurt Novy, City of Flagstaff
Glenn Morrison, community member
LTC Adrian Nagel, Camp Navajo (30 minutes)

Members absent:

Karen Underhill, community member
Tina Williams, Coconino National Forest

Interested Parties:

Carrie Marr, USFWS (by telephone)
Gavin Fielding, ADEMA/AZARNG
Environmental
MAJ Brian Saunders, NGB
Tom Parker, Camp Navajo
Diana Deming, ADEQ

Guests:

Srini Nerralla, MKM Engineers
Kim Harriz, AMEC
Kate Anthony, MKM Engineers
John Kim, Brown & Caldwell
Ken Greene, CH2MHill
Scott Veenstra, AMEC
Dana Downs-Heimes, CH2MHill
Dexter Albert, Intrinsic/The Rozelle Group

The following acronyms may be used throughout this document

ADEMA	Arizona Department of Emergency and Military Affairs
ADEQ	Arizona Department of Environmental Quality
AGFD	Arizona Game & Fish Department
AZARNG	Arizona Army National Guard
BRAC	Base Realignment and Closure
CDC	Contained Detonation Chamber
CERCLA	Comprehensive Environmental Response, Compensation, & Liability Act
COPC	Contaminants of Potential Concern
DoD	Department of Defense
EDMS	Electronic Data Management System
ERA	Ecological Risk Assessment
FOASA	Former Open Air Storage Area
FRA	Final Removal Action
FSP	Field Sampling Plan
FWPDBA	Former White Phosphorous Detonation and Burn Area (Chemical Canyon)
HHRA	Human Health Risk Assessment
IAP	Installation Action Plan
IRA	Interim Removal Action
IRP	Installation Restoration Program
HERA	Human Health & Ecological Risk Assessment
LTM	Long Term Management
MAP	Management Action Plan
MC	Munitions Constituents
MD	Munitions Debris

MEC	Munitions and Explosives of Concern
MRA	Munitions Response Area
MRS	Munitions Response Site
MWP	Master Work Plan
NAAD	Navajo Army Depot
NAU	Northern Arizona University
NGB	National Guard Bureau
OB/OD	Open Burn/Open Detonation
ORS	Ordnance Related Scrap
PBC	Performance Based Contract
ppb	parts per billion
QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
RC	Response Complete
RI/FS	Remedial Investigation/Feasibility Study
RIP	Remedy in Place
ROD	Record of Decision
SAG	Stakeholder Advisory Group
SSHP	Site Safety and Health Plan
TPP	Technical Project Planning
USACHPPM	U.S. Army Center for Health Promotion and Preventive Medicine
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish & Wildlife Service
USGS	U.S. Geological Survey
UXO	Unexploded Ordnance
WMM	Waste Military Munitions

The following matters were discussed, recommended, and/or decided.

1. *Welcome, Introductions and Announcements*

- Lee introduced Nicole Coronado, the new ADEQ representative. Nicole graduated from NAU. She was a hazardous waste inspector for the past six years, and recently began working on federal projects at ADEQ. Her other assignment is monitoring clean-up progress at a Motorola facility in Phoenix. Diana Deming of ADEQ is working with the RCRA program and will be attending SAG meetings as an interested party.
- Lee Luedeker and Randy Wilkinson were confirmed as co-chairs for the SAG during the 2007 calendar year.
- SAG members confirmed that Nicole Coronado will replace Stacy Duffy and Kurt Novy from the City of Flagstaff will replace Christine Krosnicki.
- Randy acknowledged Stacy Duffy for her outstanding contributions to the SAG and the OB/OD Area Closure Project.
- The new Garrison Commander, LTC Adrian Nagel, introduced himself and noted that the space where SAG normally meets is getting crowded. He said he will look into moving the SAG meetings from the Administration Building to a room in the new training site campus instead. He also extended an open invitation to SAG members for a tour of the Installation.

2. *Review Action Items from October SAG Meeting*

- No action items from October 2006 SAG meeting.

3. MEC Hazard Assessment Process Update

MAJ Saunders introduced Ken Greene who provided a presentation on the MEC Characterization Project in the OB/OD Area. MAJ Saunders explained that they are using a new tool, USEPA/DoD MEC Hazard Assessment Guidance for assessment of MEC risk exposure.

Ken displayed a seven-step exit strategy flow diagram: (1) Data Review and Analysis; (2) Perform Data Gap Analysis; (3) Prepare Site Specific MEC Work Plan/Site Specific Work Plan Addenda; (4) Implement Approved Site Specific Work Plan; (5) Perform Data Gap Analysis; (6) Conduct Initial MEC Hazard Assessment; and (7) Determine if Hazard Assessment is Compatible with Future Land Use.

Ken summarized the MEC Characterization Fieldwork, including Grid Cell and Primary Source Area Investigations and Corrosion Study Data for NAADs 01, 02/03 and 20. Characterization Reports for all three areas are currently in draft form, with the NAAD 20 report pending submittal to ADEQ.

All reports consider MEC characterization complete per established criteria and recommend that the NAAD designations are suitable for investigation and closure for chemical contamination. Areas known or suspected to contain MEC have been characterized as a Munitions Response Area (MRA) or a Munitions Response Site (MRS). An MRA is an area suspected or known to contain MEC; an MRS is a specific location within an MRA known to require munitions investigation or removal. MRA and MRS are basic units for MEC Hazard Assessment. As a result, NAAD 01 will now be referred to as MRA 01; NAAD 02/03 as MRA 02; and NAAD 20 as MRA 20.

Ken summarized the MEC Hazard Assessment process, including performance criteria and structure/scoring. Performance criteria include input factors such as severity, accessibility and sensitivity of MEC. (For instance, white phosphorus scores lower than high explosives.) The structure ensures that score/weight factors reflect relative contributions of input factors; helps ensure sensitivity between different land-use decisions and remedial alternatives; balances input factors that change or do not change; and ensures that scores, weights and combination methods are well defined. As a result, four output categories are identified as:

Hazard Level 1 – Highest Explosive Potential (840-1000)

Hazard Level 2 – Some Explosive Potential (725-835)

Hazard Level 3 – Low Explosive Potential (530-720)

Hazard Level 4* – Low Explosive Potential (125-525)

** Hazard Level 4 considers both current and reasonably anticipated future use conditions.*

Based on the new guidance and criteria, Camp Navajo MRA/MRS's score as follows:

MRA	MRS	Score	Hazard Level
01	A	535	3
01	B	765	2
01	C	620	3
02	A1	800	2
02	A2	695	3
02	A3	730	2
02	B	650	3
02	C-South	545	3
20		630	3

Group discussions included the following topics:

- A question was posed about where the consolidated MD goes. According to Ken Greene, MD is consolidated near and excavation or in the corner of a grid. The material is treated as solid waste and managed accordingly. Randy Wilkinson said that last year they shredded and recycled all of the MD and scrap material that had been stockpiled previously.
- MEC Hazard Assessment is a more qualitative than quantitative assessment, as provided by the new USEPA/DoD guidance.
- The process is very well-defined, and should make assessments of MEC consistent among installations nationwide. The guidance document is currently out for public review and could change depending on comments received. Extensive testing and modeling produced this model. It does not assess MD or munitions constituents (MC).
- The MEC Hazard Assessment is the key to risk assessment at sites such as Camp Navajo. The timing of the availability of this model suits the Camp Navajo project very well.
- Hazard Assessment scores can change depending on the nature of the work being done at the sites (e.g., no intrusive or off-road activities) or engineering controls (e.g., whenever an area's surface is cleared or a fence is installed to prevent access.)

4. OB/OD Program Update & Upcoming Fieldwork

MAJ Saunders provided an OB/OD Area Program Update, including an update on Decision Document Status, Closure Strategy, Site Status, CERCLA to RCRA Process, Near Term Goals and Long Term Goals.

Decision Document Status: Public Comment Periods were completed for the following locations: NAAD 01, 03, 04, 07, 08A, 08B, 09A, 09D, 10, 13, E76. No comments were received. No public comment periods are underway and none are expected in the near future. Most decision documents are at ADEQ and can be found at NAU Cline Library repository.

Randy clarified that draft decision documents are no longer available on the public website, but can be accessed on the contractor website by SAG members with login identifications and passwords provided. Or, just call Randy and a copy can be sent.

Closure Strategy:

The following four steps will be followed as part of the closure strategy:

- 1) Use the CERCLA risk-based cleanup process to investigate, remediate and close out all OB/OD Area sites.
- 2) Separate the chemical contamination issue from the MEC issue. Address MEC as part of NAAD 02, which is a RCRA site.
- 3) Focus closure of RCRA interim status on sites that were operated under interim status.
- 4) Complete RCRA Closure and Post Closure steps.

Site Closure Status: The following table summarizes the status of all sites as of February 8, 2007. Bold text indicates a change from the status presented at the October SAG meeting.

Site	Type	Fieldwork	RI/RSE	HRA	ERA	DD
01	IRP	Complete	Final	—	Final	Final
02	RCRA	Complete	Draft	Future	Future	
03	IRP	Complete	Final	—	Final	Draft
04	IRP	Complete	Final	—	Final	Draft
05	RCRA	Complete	Final	Draft	Draft	
06	RCRA	Complete	Final	Draft	Draft	
07	IRP	Complete	Final	Final	Final	Draft
08A	IRP	Complete	Final	—	Final	Draft
08B	RCRA	Complete	Final	Final	Final	Draft
09A	IRP	Complete	Final	—	Final	Draft
09C	RCRA	Complete	Final	—	—	Final
09D	RCRA	Complete	Final	—	Final	Draft
10	IRP	Complete	Final	—	Final	Draft
13	RCRA	Complete	Final	Final	—	Draft
20	IRP	Complete	Final	Final	—	
E76	IRP	Complete	Final	—	—	Draft

- NAAD 02 – lead-contaminated soil removal action is complete; interim removal action (IRA) report pending. Programmed for completion in 2008 (1 to 1½ years).
- NAAD 09C Removal Action Report – currently at NGB for review.
- NAAD 09C and NAAD 02 IRA soil stockpiles – currently working with ADEQ to develop on-site management plans; eventually, looking to dispose of some soil offsite and some soil onsite.
- Surface and ground water characterization, 2nd annual report – currently at ADEQ; copies given to City of Flagstaff (Kurt) and USFWS (Shaula) today. Over time, reports have shown that risk is insignificant. NGB feels that further groundwater monitoring isn't necessary; therefore, sampling has been discontinued.
- Cultural Resources Phase 2 Treatment Plan and Draft Memorandum of Agreement – currently at SHPO and NGB headquarters.
- Natural Resources – AZARNG drafted a programmatic biological assessment for the OB/OD Area, which is currently at USFWS.
- Supplemental MEC Characterization Project – complete; MEC Characterization Reports are in progress.
- Future Land Use Designation – still pending; currently under review with NGB (Arizona submitted documents for areas statewide.)
- NAAD 20 – NGB feels the site can be closed; will propose closure to ADEQ. Programmed for completion in 2007.
- NAAD 05 & NAAD 06 – risk assessment reports still under review.

Near Term Goals: The program will continue to transition from CERCLA to RCRA. For 2007, the program plans to accomplish the following:

Project Planning

- Installation Action Plan (IAP) Workshop/Technical Project Planning (TPP) meeting
- Define future military use
- MEC Interim Removal Action (IRA) work plan
- Record of Decision (ROD) for MRA 20
- RCRA Post Closure Plan
- Groundwater Monitoring Exemption

Fieldwork

- MEC IRA (surface MEC removal)
 - MRA 01 – MRS C, MRS A, MRS B
 - MRA 02 – MRS C-South
 - Others as funding allows

Reports

- RCRA Post Closure Plan
- Engineering Evaluation/Cost Analysis (EE/CA)
 - For MRA 01 and MRA 02
- MEC IRA Reports
- ROD/Position Papers
 - MRA 01, MRA 02 and MRA 20

Long Term Goals: Project goals for 2008 and 2009 include the following:

- Finalize EE/CA for MRA 01 and MRA 02
- ROD for 2008 Final Removal Action (FRA)
- TPP meeting and FRA work plan
- Conduct 2008 FRA
- RCRA Post Closure Permit Application – 2008
- CERCLA Closure – 2009
- RCRA Post Closure Care – 2009

Other topics:

- Carrie asked if the pits had been filled in. All MEC characterization pits and IRA excavations were backfilled last year.
- Camp Navajo wants to open up Railroad Tank and Metz Tank buffer zones for training next year.

5. June SAG Meeting, Site Visit, Public Meeting, Topics for Upcoming Newsletter

The next meeting will be at 6 p.m. on Thursday, June 14 at the Camp Navajo Training Site, and designed for members of the public to attend. The meeting should be a casual, open-house format. Contractors can develop engaging graphics and staff presentation boards for members of the public to review.

A site visit will precede the June 14 SAG meeting in the afternoon from 2-6 p.m. and include a safety briefing and guided tour of selected sites. The intention is to open up the event to members of the public and the media. Logistics of the site visit will need to be worked out with Camp Navajo and the contractors. If and how members of the public/media should RSVP should be considered. Also, it was suggested that the contractors sponsor a meal for the event by pitching in for foodstuff or hosting a barbeque. Ideally, the meal would be served concurrently with the start of the SAG meeting at 6 p.m. Marty Rozelle and Dexter Albert will work on coordinating the logistic, including foodstuff and publicity, for the site visit and evening SAG meeting.

A newsletter will be developed in conjunction with the evening SAG meeting. The intention of the newsletter is to send an update to people who have expressed interest in the project in the past, and to invite them to the SAG meeting and site tour. Marty Rozelle and Dexter Albert will mail the newsletter to approximately 200 people on the mailing list and distribute it in-person to area businesses, as well as post it at the local Post Office for nearby residents to see.

Alternatives or supplemental ways of involving the public include presenting at area environmental fairs, or tying in Camp Navajo events/tours with Flagstaff's annual Festival of Science. Also, Camp Navajo has hosted open houses in the past; that might be a good forum to get information to the public.

6. *Call to the Public*

- No one from the public was present.